

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re: CLEO B. HALL , aka	:	Chapter 13
Cleo Bernadette Hall,	:	Case No. 5:23-bk-01315-MJC
Debtor(s),	:	
DEUTSCHE BANK NATIONAL TRUST	:	
COMPANY , as Trustee for the Asset	:	
Backed Securities Corporation Long	:	
Beach Home Equity Loan Trust 2000-LB1	:	
Home Equity Pass-Through Certificates,	:	
Series 2000-LB1,	:	
Movant,	:	Motion for
v.	:	Relief from Stay
CLEO B. HALL, DAVID T. JAEDER ,	:	
Co-Debtor, and JACK N. ZAHAROPOULOS ,	:	
TRUSTEE ,	:	
Respondents,	:	

**ANSWER TO MOTION OF
DEUTSCHE BANK NATIONAL TRUST COMPANY FOR RELIEF FROM STAY**

AND NOW COMES Debtor(s) **CLEO B. HALL**, by and through their attorneys, J. ZAC CHRISTMAN, ESQUIRE, and in Answer to the Motion of **DEUTSCHE BANK NATIONAL TRUST COMPANY** for Relief from Stay aver:

- 1-2. Admitted.
3. Denied. Upon information and belief, the Trustee was appointed by the Office of United States Trustee.
4. Denied to the extent the document(s) attached as Exhibit C do not speak for themselves.
- 5-6. Admitted.
7. Denied. Debtor lacks sufficient information and belief as to the exact amount due postpetition, and such is therefore Denied.
8. Denied. See response to paragraph 7, above.

9. Denied to the extent the averments of paragraph 9 are other than a statement or conclusion of law or misplaced request for relief that does not require a response. Also, see response to paragraph 6, above.

10. Admitted in part and Denied in part. The current Plan payment arrears is \$5,000.

11. Denied to the extent the averments of paragraph 11 are other than a statement or conclusion of law or misplaced request for relief that does not require a response.

12. Denied to the extent the averments of paragraph 12 are other than a statement or conclusion of law or misplaced request for relief that does not require a response

WHEREFORE, Debtor **CLEO B. HALL**, respectfully prays this Honorable Court for an Order than the Motion of **DEUTSCHE BANK NATIONAL TRUST COMPANY** for Relief from Stay be Denied, or in the alternative for an adequate protection order, and for such other and further relief as the Honorable Court deems just and appropriate.

Respectfully Submitted,

/s/ J. Zac Christman
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